

**From:** [Jonathon Warner](#)  
**To:** [Emanuel Kataev](#)  
**Cc:** [Karl Scheuerman](#)  
**Subject:** Re: Watchdog v. Gelardi  
**Date:** Friday, April 14, 2023 5:08:16 PM  
**Attachments:** [image001.png](#)

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I am advised that my client has shut down the business and is dismantling her website. i am in Jamaica until April 19. I cannot get you any affidavit until I return.

Sent from my iPad.

On Apr 12, 2023, at 2:25 PM, Emanuel Kataev <[Emanuel@mlaborlaw.com](mailto:Emanuel@mlaborlaw.com)> wrote:

Jonathan:

You are simply incorrect and sorely mistaken, as the forensic evidence proves the contrary. Attached is the e-mail Adam sent with the Exhibit B to the Sealed Documents. There is therefore no problem and there is nothing to do because your client indisputably received the master list in Exhibit B. The court-authorized notice will go out to the customers listed in the Enjoined Customers List.

Regards,

**Emanuel Kataev, Esq.**  
**Associate**  
**Milman Labuda Law Group PLLC**  
3000 Marcus Avenue, Suite 3W8  
Lake Success, NY 11042-1073  
(516) 328-8899 (office)  
(516) 303-1395 (direct dial)  
(516) 328-0082 (facsimile)  
[emanuel@mlaborlaw.com](mailto:emanuel@mlaborlaw.com)

This message and its attachments may contain confidential information that is legally privileged. If you are not the intended recipient, you are hereby notified that any printing, copying, forwarding, or saving of this message is strictly prohibited. If you have received this email in error, please notify the sender immediately and delete the message and any attachment from your system.

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**From:** Jonathon Warner <[jdwarner@wslaw.nyc](mailto:jdwarner@wslaw.nyc)>  
**Sent:** Tuesday, April 11, 2023 1:35 PM  
**To:** Emanuel Kataev <[Emanuel@mlaborlaw.com](mailto:Emanuel@mlaborlaw.com)>  
**Cc:** Karl Scheuerman <[kescheuerman@wslaw.nyc](mailto:kescheuerman@wslaw.nyc)>  
**Subject:** Watchdog v. Gelardi

In your haste to send out a notice to alleged Watchdog clients, I believe that you included an exhibit to the Court that was misrepresented as a list of Watchdog's 2017 clients when in fact it was a marketing list. (See Exhibit B to Docket 180). I believe that Exhibit B does not represent Watchdog clients, but rather is marketing list of firms that Watchdog may have wanted to have as clients. I am advised that Watchdog's employee Adam Rosenblatt actually sent a list of Watchdog's clients to Ms. Gelardi, which I am attaching hereto. Your conduct has caused a vast overstatement of the law firms on the Enjoined Customer List. What do you propose to do about this problem? Kindly advise.

[Jonathon D. Warner, Esq.](#)

Warner & Scheuerman

6 West 18<sup>th</sup> Street, 10<sup>th</sup> Floor

New York, NY 10011

Office: 212.924.7111

Fax: 212.924.6111

Cell: 917.656.4197

[www.wslaw.nyc](http://www.wslaw.nyc)

<image001.png>

<2017-04-28 IME Watchdog Clients BRG8006.pdf>

<BRG\_0000008006.0001.XLSX>

**From:** [Emanuel Kataev](#)  
**To:** [Jonathon Warner](#)  
**Cc:** [Karl Scheuerman](#)  
**Subject:** RE: IME WatchDog, Inc. v. Gelardi, et al.; Case No.: 1:22-cv-1032 (PKC) (JRC).  
**Date:** Thursday, April 13, 2023 1:01:00 PM  
**Attachments:** [image001.png](#)

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Counselors:

We write to follow up on our demand for a sworn statement confirming that they are not serving the five customers listed below nor any other customers on the Enjoined Customers List. If we do not receive same by 5:00 PM tomorrow, we will seek appropriate relief from the Court.

Regards,

**Emanuel Kataev, Esq.**  
**Associate**  
**Milman Labuda Law Group PLLC**  
3000 Marcus Avenue, Suite 3W8  
Lake Success, NY 11042-1073  
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[emanuel@mllaborlaw.com](mailto:emanuel@mllaborlaw.com)

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**From:** Emanuel Kataev  
**Sent:** Sunday, April 09, 2023 7:45 PM  
**To:** Jonathon Warner <jdwarner@wslaw.nyc>  
**Cc:** Karl Scheuerman <kescheuerman@wslaw.nyc>  
**Subject:** RE: IME WatchDog, Inc. v. Gelardi, et al.; Case No.: 1:22-cv-1032 (PKC) (JRC).

Counselors:

The customers are: (i) Subin Associates LLP; (ii) Ginarte Gonzalez & Winograd LLP; (iii) Zemsky & Salomon P.C.; (iv) Bergman Bergman, Fields & Lamonsoff LLP; and (v) Zarembo Brown PLLC.

We seek a sworn statement from the Defendants to the extent they deny continuing to serve these customers. Absent same, we will seek appropriate relief from the Court.

Regards,

**Emanuel Kataev, Esq.**  
**Associate**  
**Milman Labuda Law Group PLLC**

3000 Marcus Avenue, Suite 3W8  
Lake Success, NY 11042-1073  
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**From:** Jonathon Warner <[jdwarner@wslaw.nyc](mailto:jdwarner@wslaw.nyc)>

**Sent:** Thursday, April 06, 2023 5:31 PM

**To:** Emanuel Kataev <[Emanuel@mllaborlaw.com](mailto:Emanuel@mllaborlaw.com)>

**Cc:** Karl Scheuerman <[kescheuerman@wslaw.nyc](mailto:kescheuerman@wslaw.nyc)>

**Subject:** RE: IME WatchDog, Inc. v. Gelardi, et al.; Case No.: 1:22-cv-1032 (PKC) (JRC).

Kindly identify the customers that you contend Defendants are continuing to serve in violation of the Injunction, so that I can properly respond to your allegations.

[Jonathon D. Warner, Esq.](#)

Warner & Scheuerman  
6 West 18<sup>th</sup> Street, 10<sup>th</sup> Floor  
New York, NY 10011  
Office: 212.924.7111  
Fax: 212.924.6111  
Cell: 917.656.4197  
[www.wslaw.nyc](http://www.wslaw.nyc)



---

**From:** Emanuel Kataev <[Emanuel@mllaborlaw.com](mailto:Emanuel@mllaborlaw.com)>

**Sent:** Thursday, April 6, 2023 5:20 PM

**To:** Jonathon Warner <[jdwarner@wslaw.nyc](mailto:jdwarner@wslaw.nyc)>

**Subject:** Re: IME WatchDog, Inc. v. Gelardi, et al.; Case No.: 1:22-cv-1032 (PKC) (JRC).

Mr. Warner:

Please see attached.

Regards,

**Emanuel Kataev, Esq.**  
**Associate**  
**Milman Labuda Law Group PLLC**  
3000 Marcus Avenue, Suite 3W8  
Lake Success, NY 11042-1073  
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**MILMAN LABUDA LAW GROUP PLLC**

3000 MARCUS AVENUE  
SUITE 3W8  
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899  
FACSIMILE (516) 328-0082

April 6, 2023

**VIA E-MAIL**

Warner & Scheuerman  
Attn: Jonathan D. Warner, Esq.  
6 West 18th Street, 10th Floor  
New York, NY 10011-4602  
jdwarn@wslaw.nyc

**Re: IME WatchDog, Inc. v. Gelardi, et al.**  
**Case No.: 1:22-cv-1032 (PKC) (JRC)**  
**MLLG File No.: 25-2022**  
**NOTICE TO CEASE & DESIST**

Dear Mr. Warner:

This office represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case. Plaintiff writes to place you on notice that it has come to its attention that Defendants are in violation of the injunction issued on March 27, 2023 by continuing to serve customers Defendants misappropriated from Plaintiff.

Plaintiff demands that Defendants immediately cease and desist from these violations under pain of contempt and sanctions. Should we not receive written confirmation by Monday, April 10, 2023, via sworn statement, that Defendants are in full compliance with the Court's injunction, Plaintiff will be left with no choice but to move for appropriate relief and appropriately subpoena the parties that Defendants continue to serve.

Dated: Lake Success, New York  
April 6, 2023

Please be guided accordingly,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Emanuel Kataev, Esq.  
Jamie S. Felsen, Esq.  
Emanuel Kataev, Esq.  
3000 Marcus Avenue, Suite 3W8  
Lake Success, NY 11042-1073  
(516) 328-8899 (office)  
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*Attorneys for Plaintiff*  
*IME WatchDog, Inc.*